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Date: 7/26/2018 12:16:55 PM  
Subject: FW: Final Phase 1 HCT Termination

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Hi, I received feedback from Chris Eckley re the final HCT termination. The report is responsive; however, we have one comment.

Please feel free to let me know if you have any questions.

**Phase 1 Humidity Cell Termination Testwork Report. Section 4.1 paragraph 5:**

“Mercury test methods with lower reporting limits (e.g. EPA 1631) are not considered appropriate for humidity cells in a lab environment, because the tests are not carried out in a class-100 clean room”

From my experience, mercury studies are routinely carried out in laboratory spaces that are not class-100 clean rooms. There is a distinction between the laboratory space where a HCT test is conducted and the laboratory space where the mercury is actually being analyzed, which I concur should be in a class 100 clean room if possible.

In particular, we are unclear what is meant by the statement “not considered appropriate”. Specifically, we are unclear why or who would not consider this appropriate. We believe that EPA 1631 focuses on the analysis of mercury samples and not on the conditions under which they are generated.

We suggest changing the text to: “Mercury analysis with lower reporting limits (e.g. EPA 1631) was not conducted due to concerns about whether the laboratory conditions under which the HCTs were conducted could produce results there were not adversely impacted by contamination. However, investigations are currently being conducted to determine whether defensible analysis of low-level mercury can be achieved in the laboratory conducting the Phase 2 HCTs, which are currently underway. To assist with this process, the US EPA document on ‘*Guidance for Implementation and Use of EPA Method 1631 for the Determination of Low-Level Mercury*’ (EPA, 2001) is being used to guide appropriate techniques that can be used with Method 1631’.

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